

COVER SHEET FOR AMENDMENT OF POST-TRAVEL SUBMISSION

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Instructions: Use this form as a cover sheet for any paperwork you may need to submit to the Office of Public Records in order to make your Privately Sponsored Post-Travel Submission complete in accordance with Rule 35. Only complete this form if you need to submit an amendment to a post-travel filing you have already submitted.

SUBMIT DIRECTLY TO THE OFFICE OF PUBLIC RECORDS IN 232 HART BUILDING

Name of Traveler: Zachary Mallove

Employing Office/Committee: US Senator Patty Murray

Travel Expenses Paid by (List all sources): Airfare, lodging and meals

Travel Date(s): September 17 to 22, 2018

Description/Title of Attached Forms: Trip Invitation

Private Sponsor Travel Certification Form (PSTCF)

Purpose of Amendment (describe the reason for amending original submission):
I failed to include these documents in the original post-travel filing. My apologies!

June 7, 2019

(Date)


(Signature of Traveler)

Mallove, Zach (Murray)

From: Cody Tucker <ctucker@ppionline.org>
Sent: Monday, July 30, 2018 2:20 PM
To: Mallove, Zach (Murray)
Subject: Invitation: PPI Policy Mission to Dublin & London, 9/17-22
Attachments: Invitation - PPI Policy Mission to Dublin & London 2018.pdf

Hey Zach,

Attached please find an invitation to join PPI and a bipartisan delegation of senior congressional staff on a mission to Dublin and London from September 17 to 22, 2018.

This mission will cover ongoing competition investigations in Europe, how the new US tax law is impacting US-EU & US-UK relations, new digital privacy & social media laws, the geopolitical impact of Brexit, and other critical issues pertinent to the transatlantic relationship.

PPI is a non-profit 501(c)(3) nonpartisan organization with the mission of providing educational programming on current policy issues. This mission will serve as part of a decades long PPI dialogue with our European partners to strengthen US-EU ties.

It will be a very informative mission in a great part of the world, and we hope you can make it. Please let me know if you have any questions and RSVP to me as soon as possible, as space is limited.

Best,
Cody

Cody Tucker

Director of Public Affairs
Progressive Policy Institute
202.525.3926 | 949.874.5074 (mobile)
www.progressivepolicy.org

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On behalf of the Progressive Policy Institute (PPI), I'd like to invite you to join us for a transatlantic mission to Dublin and London from Monday, September 17 to Saturday, September 22, 2018.

This will be PPI's sixth time hosting a bipartisan delegation of senior congressional staff for high-level policy meetings in Europe and the United Kingdom with our transatlantic allies and partners. With an uncertain geopolitical landscape in Europe post-Brexit—and ever changing political dynamics in the United States—the desire from key players in Europe to meet and talk with their American counterparts in Congress is at a significantly heightened level. With this in mind, PPI believes it is important for U.S. policy professionals to experience and learn about the European view on critical issues not represented in domestic press reports and to inform our allies of Congress' work in these areas.

This mission will cover a wide range of topics and the schedule is not for the faint of heart; you will see much of Dublin and London in a short period of time!

Specifically, this mission will hold meetings directly related to:

- Ongoing competition, or "State Aid," investigations targeting US multi-nationals
- The impact of digital privacy laws and crackdown on social media
- The aftermath of Brexit and what it means for US-UK relations
- The new U.S. tax law's impact EU-US relations
- The political landscape across Europe and its effect on the future of the EU when the UK officially exits in 2019

PPI is a non-profit 501 (c)(3) organization with the mission of providing educational programming on current policy issues. As such, this mission will comply with House and Senate ethics rules. PPI was a leader in the founding and push for the "Third Way" movement in the 1990s and has continued this work since then by maintaining relationships in Europe and producing informative and thought provoking transatlantic missions and reports.

I hope that you will be able to join us in what promises to be an insightful and educational mission to Dublin and London. Space is limited; please contact me at 202-775-0106 or ctucker@ppionline.org to RSVP or if you require further information.

Regards,



Cody Tucker
Director of Public Affairs
Progressive Policy Institute

202 775 0106

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

Progressive Policy Institute (PPI)

1. Sponsor(s) of the trip (please list all sponsors): _____

2. Description of the trip: To inform US congressional staff about issues related to US-EU relationship from a European perspective, including tax, trade, privacy, competition, anti-trust, and foreign policy.

3. Dates of travel: September 17 to September 22, 2018

4. Place of travel: Dublin, Ireland; London, United Kingdom

5. Name and title of Senate invitees: Please see attached.

6. I *certify* that the trip fits one of the following categories:

☒ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal and do not retain or employ registered lobbyists or agents of a foreign principal and no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

- OR -

☐ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).

7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.

- AND -

☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.

8. I *certify* that:

☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.

- AND -

☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

— OR —

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10*).

— OR —

☐ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

PPI is the sole sponsor in organizing and conducting the trip.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

This trip is a continuation of nearly 30 years of PPI's work in Europe. The purpose of the trip is related to our mission of educating congressional staff on US-EU issues from a European perspective and how the EU and US governments can better work together on common issues.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

PPI has sponsored congressional travel to New Orleans in 2001, New York City in 2015, and Europe from 2014 to 2018.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

and analysis of policy proposals and hosting of educational programming.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate <input type="checkbox"/> Actual Amounts	\$1300	\$900	\$600	

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

b) This trip involves an event that is arranged or organized specifically with regard to congressional participation

18. Reason for selecting the location of the event or trip

Key European policy and political developments are being made in the locations of this trip.

19. Name and location of hotel or other lodging facility:

Clayton Hotel Cardiff Lane, Dublin, Ireland; Strand Palace Hotel, London, United Kingdom

20. Reason(s) for selecting hotel or other lodging facility:

Location and cost

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

All daily expenses are below the maximum per diem rates for official Federal Government travel.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Coach airplane travel will be provided.

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

N/A

25. I hereby *certify* that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you *must* include a completed signature page for each additional sponsor):

Signature of Travel Sponsor:

Name and Title: Lindsay Mark Lewis, Executive Director

Name of Organization: Progressive Policy Institute (PPI)

Address: 1200 New Hampshire Ave. NW Suite 575, Washington, D.C. 20036

Telephone Number: 202-617-4042

Fax Number: 202-525-3941

E-mail Address: llewis@ppionline.org

(to be completed by each additional sponsor)

I hereby *certify* that the information contained on pages 1-4 of the certification form and any accompanying addenda, all submitted in connection with the _____ trip
to _____ is true, complete, and correct.
Dates of Travel (Month Day, Year)
Place of Travel

E-mail Address: _____

Private Sponsor Certification – Additional Sponsor Signature Page

[illegible]

Instructions
(Do not file the Instructions with OPR)

General Instructions

- The Senate Select Committee on Ethics (“Ethics Committee”) has developed guidelines for evaluating privately-sponsored trips and for judging whether trip expenses are reasonable. Trip sponsors should consult the *Senate Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel*, including the *Glossary of Terms*, prior to filling out the *Private Sponsor Travel Certification Form* and contact the Ethics Committee at (202) 224-2981 with any additional questions. The Ethics Committee will make the final determination as to whether the expenses incurred during a privately-sponsored trip are reasonable.
- If there are multiple sponsors, they should jointly complete one *Private Sponsor Travel Certification Form* for the trip. Each travel sponsor should complete the signature block.
- When evaluating a trip proposal and judging the reasonableness of expenses, the Ethics Committee will consider the following factors:
 - a. the stated mission of the organization sponsoring the trip;
 - b. the organization’s prior history of sponsoring congressional trips, if any;
 - c. other educational activities performed by the organization besides sponsoring congressional trips;
 - d. whether any trips previously sponsored by the organization led to an investigation by the Select Committee on Ethics;
 - e. whether the length of the trip and the itinerary is consistent with the official purpose of the trip;
 - f. whether there is an adequate connection between a trip and official duties;
 - g. the reasonableness of the total amount spent by a sponsor of the trip;
 - h. whether there is a direct and immediate relationship between a source of funding and an event;
 - i. the maximum *per diem* rates for official Federal Government travel published annually by the General Services Administration, the Department of State, and the Department of Defense;
 - j. whether travel to a location or event is arranged or organized without regard to congressional participation, or whether it is specifically organized for Congressional staff; and
 - k. any other factor deemed relevant by the Select Committee on Ethics.

Consult the *Senate Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel*, including the *Glossary of Terms*, for further discussion of these factors.

- Responses to each question should be brief, consistent with the requirement to provide all relevant information. Attach additional pages, as necessary.
- To allow sufficient time for the Ethics Committee to review requests for privately sponsored travel, the participating Senate Members, officers, and employees must submit the completed form to the Ethics Committee at least **thirty (30) days** before the date of the proposed trip.

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- Example:* A trip sponsor that is a § 501(c)(3) non-profit organization asks a lobbyist to recommend staffers who might be most interested in joining a trip to the U.S.-Mexican border. If a lobbyist knows a staffer who has a particular interest in the DEA's activities at the border, then providing that information (in light of the trip sponsor's request), in and of itself, would not exceed a *de minimis* level of participation, and would be permitted. However, it would not be permissible for the lobbyist to initiate contact with the trip sponsor to suggest that a particular Senate staffer be invited or forward an invitation to that staffer. Consult the instructions for question 9 to determine if the trip meets the lobbyist accompaniment standards.

9. *Lobbyist/agent of a foreign principal accompaniment standards:* Senate Members, officers, and staff may not accept privately-sponsored travel from an entity that retains or employs one or more federally-registered lobbyists or foreign agents unless one of the listed scenarios applies. *At any segment of the trip* means lobbyists may not accompany the Senate invitee for parts of the travel to and from the event (not at the event itself or the location being visited). *At any point throughout the trip* means lobbyists may not accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited, other than in a *de minimis* way. This is a broader prohibition than the *at any segment of a trip* standard.

“De minimis” exception: Both lobbyist/agent of a foreign principal “accompaniment” prohibitions include a *de minimis* exemption. *De minimis* means negligible or inconsequential. The mere coincidental presence of a lobbyist or foreign agent at an event would likely be considered *de minimis*. But in making the final determination, the Ethics Committee will consider the totality of the circumstances, including the amount of time lobbyists or foreign agents are present at the event; the amount of direct contact they have with Senate invitees; and the amount of control a trip sponsor has over their presence or contact with Senate guests. For example, if the trip includes attendance at an event considered widely-attended under Rule 35(1)(c)(18), the trip sponsor is unlikely to know all attendees present. Thus, it is likely to be permissible for such widely-attended events to include both a Senate guest and a lobbyist. Similarly, an organization cannot possibly know all the other passengers taking the same flight or other common carrier to a given destination. Accordingly, the sponsor does not need to certify that it knows for certain that no lobbyist or foreign agent will be on such a common carrier.

10. *If travel includes two overnight stays:* The Ethics Committee may approve two overnight stays for trips sponsored by an entity that employs or retains one or more lobbyists or foreign agents under certain conditions. Consult Committee regulations for additional information.
11. *An itinerary for the trip is attached to this form:* The Ethics Committee will not review the trip request without a detailed (hour-by-hour), complete and final itinerary for the trip. As a general matter, the Ethics Committee advises that each travel day contain a minimum of 6 hours of officially-related activities for Senate invitees.
12. *Briefly describe the role of each sponsor in organizing and conducting the trip:* A sponsor must have a significant role in organizing and conducting a trip and must have a specific organizational interest in the purpose of the trip.
13. *Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:* Provide a brief description of the stated mission of each sponsor and how it relates to the trip.
14. *Briefly describe each sponsor's prior history of sponsoring congressional trips:* Provide a brief discussion of the sponsor's history of sponsoring congressional travel. It is not necessary to list every trip.
15. *Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):* Provide a brief description of the educational activities performed by each sponsor. It is not necessary to list every individual activity; the description may be by kind or category of educational activity involved.
16. *Total expenses for each participant:* Indicate whether the figures provided are actual amounts or good faith estimates by checking the appropriate box. All trip expenses should be included. Expenses other than those for transportation, lodging, and meals must be individually listed and specified. Attach additional pages as necessary.

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